



JOHN A. OLSZEWSKI, JR.  
*County Executive*

ROB O'CONNOR  
*Director OIT*

February 12, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum  
Between 3.7 and 24 GHz***  
**ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band***  
***Ex Parte* Communication**

Dear Ms. Dortch:

I am filing this letter on behalf of Baltimore County Maryland.

- Baltimore County operates twenty-two (22) 6 GHz microwave paths throughout the County within the U-NII-5 and U-NII-7 bands. The County's 6 GHz microwave system carries all two-way radio traffic for the County's public safety and public service employees. These employees provide both emergency and routine services supporting a population of 832,000 throughout 598 square miles. Services are provided to both permanent residents as well as people working and travelling through the county.

Additionally, the County's 6 GHz microwave system carries public safety traffic for the following allied agencies:

- CMARC (Central Maryland Area Regional Communications Committee) a regional conventional and trunked interoperability communications system. This system provides interoperability communications for the seven jurisdictions in the Baltimore Metropolitan Statistical Area.
- MIEMSS (Maryland Institute for Emergency Medical Services Systems) is responsible for emergency medical communications for both land based and medevac helicopter communications.
- The County's microwave network design criteria has a path reliability of 99.9999% with an overall reliability of 99.999%. Our concern is interference from unlicensed (uncontrolled) devices operating in these frequency bands could increase the noise floor thus reducing the constructed reliability level and or cause an outage on one or more paths. Locating an interference source in this frequency band will be difficult at best. As such, delays in mitigating any interference places the County public safety services at increased risk due to path outages and or reduces reliability, thereby increasing the potential for a service disruption.

- We support the interference analysis provided by the Fixed Wireless Communication Coalition dated October 2, 2018. And we also appeal to the FCC to complete a thorough evaluation and analysis of the interference from these proposed devices to the microwave systems operating these 6 GHz frequency bands.
- If unlicensed devices are allowed in these frequency bands, the County urges the FCC to consider a practical implementation of an automated frequency control/coordination (AFC) system, registration of devices as well as an accurate and timely listing of all 6 GHz systems in use and those included in the Prior Coordination Notice (PCN) process.
- It would be very unfortunate if the performance and reliability of a multimillion dollar microwave system providing critical life safety radio traffic, is dependent upon low cost devices and users following the registration process.

Respectfully submitted,



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